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June 15, 2022

By ECF

Honorable Colleen McMahon
United States District Court,
Southern District of New York
500 Pearl Street, Room 24A
New York, New York 10007

Re: *S.E.C. v. Airborne Wireless Network, et al.* (No. 21-cv-1772) (CM)

Dear Judge McMahon:

Pursuant to Local Rule 7.1(d) and Your Honor's Individual Rule I(D), Defendants Airborne Wireless Network, Kalistratos Kabilafkas, Timoleon Kabilafkas, Jack Edward Daniels, and Eric Scheffey, Relief Defendants Timoleon Kabilafkas, in his capacity as trustee of the Tim Kabilafkas Revocable Trust dated July 24, 2001, and Magdaline Kabilafkas, in her capacity as trustee of the Magdaline Kabilafkas 1989 Trust dated May 27, 1989, and Plaintiff U.S. Securities and Exchange Commission ("SEC") (collectively, the "Parties") jointly request the Court to extend the Parties' deadline to complete discovery from July 15, 2022, as set forth in the Court's Case Management Plan (ECF No. 67), to August 2, 2022.

The Parties have diligently engaged in discovery and are on track to complete document production, written discovery, and party and expert depositions by the original deadline to complete discovery of July 15, 2022. However, the Parties anticipate that they may need additional time to complete third-party depositions, and request this short extension due to scheduling conflicts that have arisen amongst counsel due to the cross-country travel that will be required for said depositions, and the unavailability of certain third-party witnesses. The Parties previously requested and were granted extensions to the Parties' expert report deadlines. (ECF Nos. 136, 150.) However, this is the Parties' first request to extend the overall discovery deadline. The requested extension would not affect any other scheduled dates or deadlines in this action (ECF No. 67), and would not prejudice any party.

We thank the Court for its attention to this matter.

Honorable Colleen McMahon
April 8, 2022
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Very truly yours,

/s/ Mark E. Bini

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